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March 12, 2004

VIA E-MAIL and HAND-DELIVERY

David S. Rosenzweig, Esq.
Keegan, Werlin & Pabian, LLP
265 Franklin Street, Sixth Floor
Boston, MA 02110

RE: NSTAR Electric, D.T.E. 03-121

Dear Mr. Rosenzweig:

Enclosed please find the Members of the NE DG Coalition's fifth set of information requests in the above-captioned matter. Responses should be filed on or before March 26, 2004. If you have any questions, please contact me.

Sincerely,

Robert M. Granger

RMG:nbc
Enclosures

cc: Mary Cottrell (by hand)
William Stevens (by hand)
John Cope-Flanagan (by hand)
Sean Hanley (by hand)
Claude Francisco (by hand)
Xuan Yu (by hand)
Robert Harrold (by hand)
Service List (by mail)

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIFTH SET OF INFORMATION REQUESTS OF
THE MEMBERS OF THE NE DG COALITION TO
NSTAR ELECTRIC, D.T.E. 03-121**

Pursuant to 220 C.M.R. 1.06(6)(c), the Members of the NE DG Coalition ("NE DG Coalition") hereby submit to Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the NE DG Coalition to Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company in this proceeding.

1. "NSTAR Electric" or "Companies" means Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company, their officers, directors, employees, consultants, and attorneys.
2. "Company" means each of Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company and their respective officers, directors, employees, consultants and attorneys. Where a request is directed to "the Company" or "each of the Companies" provide a separate response for each Company.
3. "Department" means the Department of Telecommunications and Energy.
4. "Proposed Rates" means the rates proposed by the Companies in this proceeding: Boston Edison Company, Rates SB-1 and SB-2; Cambridge Electric Light Company, Rates SB-1, MS-1, SS-1, SB-2 and SB-3; and Commonwealth Electric Company, Rates SB-1 and SB-2.
5. "Applicable Rate Schedule" means the Applicable Rate Schedule referred to in each of the Proposed Rates.
6. "Distributed Generation" or "DG" has the meaning ascribed to it in G.L. c. 164, §1.
7. "Last General Rate Case" means, for each Applicable Rate Schedule, the last Department proceeding in which the Company submitted a cost of service study in support of the Applicable Rate Schedule.
8. "Companies' Filing" or "Filing" means all the documents NSTAR Electric filed in this proceeding.

9. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
10. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
11. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
12. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
13. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
14. If the Company finds that any of these requests is ambiguous, please notify the NE DG Coalition counsel so that the requests can be clarified prior to the preparation of a written response.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIFTH SET OF INFORMATION REQUESTS OF
THE MEMBERS OF THE NE DG COALITION TO
NSTAR ELECTRIC, D.T.E. 03-121**

Pursuant to 220 C.M.R. § 1.06(6)(c), the Members of the NE DG Coalition ("NE DG Coalition") hereby submit to NSTAR Electric the following information requests.

- NEDGC 5-1. Explain the following statement in the response to NEDGC 2-16: “there is diversity among customers that pursue energy efficiency initiatives, with many customers participating and those customers being connected on the same distribution circuits.” Include in the response: the meaning of “diversity”; a description of a “distribution circuit”; the approximate or average number of customers connected to a distribution circuit; and the corresponding number of customers on a distribution circuit who participate in energy efficiency initiatives. Provide complete and detailed documentation for the response.
- NEDGC 5-2. Referring to the response to NEDGC 2-23, provide records of major system renovations for the years 1993-2003 in the form and format maintained by the Company.
- NEDGC 5-3. Referring to the response to NEDGC 1-2, which response incorporates by reference the response to AG 1-1, explain each of the allocation factors used in AG 1-1(a) and AG 1-1(b) to allocate distribution plant accounts 360 to 373. Provide complete and detailed documentation for your response.
- NEDGC 5-4. Referring to the response to NEDGC 2-1, provide a copy of the letter, referred to in a March 10, 2004 Boston Globe article, sent in September 2003 by NSTAR chief executive Thomas J. May to then Boston University Chancellor John R. Silber, which letter references BU’s proposal to install a fuel cell to serve a portion of BU’s energy requirements. Provide copies of all other correspondence sent in the last twelve months by officers, employees or representatives of NSTAR Electric to NSTAR Electric customers, which correspondence references the customer’s proposal to install on-site generation to serve a portion of the customer’s load.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

CERTIFICATE OF SERVICE

DTE 03-121

I hereby certify that I have this day served the foregoing Fifth Set of Information Requests of the Members of the NEDG Coalition upon all parties of record in this proceeding in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Practice and Procedure.)

Dated at Boston this 12th day of March, 2004.

Robert M. Granger

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